

AO 91 (Rev. 11/11) Criminal Complaint

Agent:

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Fahad AHMED

Case: 2:24-mj-30470

Assigned To : Unassigned

Assign. Date : 10/31/2024

Case No.

Description: RE: FAHAD AHMED  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 29, 2024 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

Title 8, United States Code, Section 1326(a)

Unlawful Re-entry after Removal from the United States

This criminal complaint is based on these facts:

On or about October 29, 2024, in the Eastern District of Michigan, Southern Division, Fahad AHMED, an alien from Bangladesh was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about June 6, 2024, at or near Lewiston, New York and not having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326 (a).

☒ Continued on the attached sheet.*Complainant's signature*Michael Everson, BPA*Printed name and title*Sworn to before me and signed in my presence  
and/or by reliable electronic means.*Judge's signature*Date: October 31, 2024City and state: Detroit, MI~~XXXXXXXXXXXX~~ U.S. Magistrate JudgeDavid R. Grand *Printed name and title*

**AFFIDAVIT**

I, Michael Everson, declare the following under penalty of perjury:

1. I am a Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. I have been employed in this capacity since December 2011. Currently, I am assigned to the Detroit Border Patrol Station. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol Agents and record checks of law enforcement databases. I have also reviewed material from the official Immigration file and system automated data relating to Fahad AHMED, which reveals the following:
2. AHMED is a twenty-six-year-old male, native and citizen of Bangladesh, who last entered the United States at or near an unknown place, on or about October 26, 2024, without being admitted, inspected, or paroled by an Immigration Officer.
3. On or about April 25, 2024, AHMED was arrested by Border Patrol Agents at or near Mooers, New York for illegally entering the United States. He was processed for an Expedited Removal.
4. On or about June 6, 2024, AHMED was removed back to Canada through Lewiston, New York.
5. On or about October 29, 2024, AHMED was encountered by Border Patrol Agents near Detroit, Michigan following a call from Detroit Police Department requesting assistance to help identify a subject they encountered. While being interviewed by agents, AHMED stated that he was a citizen and national of Bangladesh and that he illegally entered the United States on or about October 26, 2024, however, he did not know the location of his entry. AHMED was transported to the Detroit Border Patrol Station for processing. His prior order of removal was reinstated.
6. Fahad AHMED's fingerprints and photograph were captured and entered into the Automated Biometric Identification System (IDENT) and the Integrated Automated Fingerprint Identification System (IAFIS). The results revealed that AHMED is a citizen of Bangladesh with the foregoing immigration history who has been previously removed from the United States. The record checks did not provide any evidence that AHMED

legally entered the United States or had been issued any document or status that would allow him to enter or remain the United States.

7. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
8. Review of the Alien File (A#xxx xxx 360) for Fahad AHMED and queries in Department of Homeland Security databases confirm no record exists of AHMED obtaining the express permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States following his removal on June 6, 2024.
9. Based on the above information, I believe there is probable cause to conclude that Fahad AHMED, is an alien who was found in the United States after removal, without the express permission from the Attorney General of the United States or from the Secretary of the Department of Homeland Security to re-apply for admission into the United States in violation of Title 8, United States Code, Section 1326(a).



Michael Everson, Border Patrol Agent  
U.S. Department of Homeland Security

Subscribed and sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable ~~XXXXXXXXXX~~ David R. Grand  
United States Magistrate Judge

October 31, 2024